

# **Exhibit 2**

**DEFENDANTS' UPDATED PROPOSED SCHEDULE**

Entries marked with an \* indicate dates already set by the Court.

Entries marked with an \*\* indicate dates previously agreed to by the parties.

<b><u>EVENT</u></b>	<b><u>DATE</u></b>
<b>A. DEALER CLASS CONSOLIDATED COMPLAINT</b>	
1. Deadline to File Consolidated Amended Complaint	June 4, 2018*
2. Deadline for Defendants to Answer or Otherwise Plead	July 11, 2018* (Defendants may file earlier than this date)
3. Plaintiffs' Response to Defendants' Motions to Dismiss (if any)	21 days after Defendants' file any motions to dismiss
4. Defendants' Replies in Support of their Motions to Dismiss	14 days after Plaintiffs file their response
5. Defendants' Answers to Consolidated Complaint	28 days of a final ruling on any motion to dismiss**
<b>B. DISCOVERY (ALL PLAINTIFFS)</b>	
1. Deadline for all parties to exchange <i>Authenticom</i> productions as well as documents produced to the FTC in connection with its current investigation of Defendants (with documents produced to the FTC identified by bates number)	May 9, 2018*
2. Deadline for <i>Authenticom</i> third parties represented by counsel for one of the MDL parties to re-produce their third party productions in the MDL	May 9, 2018
3. Deadline to notify <i>Authenticom</i> third parties not represented by counsel for one of the MDL parties of production of their documents in the MDL	May 4, 2018
4. Deadline to re-produce documents of <i>Authenticom</i> third parties not represented by counsel for one of the MDL parties (absent objection by third party)	May 18, 2018
5. Deadline for service of Rule 26(a)(1) disclosures (including any amendments to the <i>Authenticom</i> disclosures. <b><i>Class Plaintiffs' disclosures will also include a statement as to the individual named plaintiffs that will prosecute this matter on behalf of</i></b>	May 4, 2018

<u>EVENT</u>	<u>DATE</u>
<i>the putative class, a statement as to the scope of the putative class, and the identification of the parties that will be named defendants in the Consolidated Class Complaint.</i>	
6. Deadline to serve any additional, non-duplicative, coordinated discovery requests, search terms, and custodians	May 25, 2018
a. Responses to discovery requests due	June 22, 2018
b. Deadline to file Motions to Compel	August 6, 2018
c. Responses to Motions to Compel	August 27, 2018
d. Replies in Support of Motions to Compel	September 10, 2018
7. Substantial Completion Deadline for Production of Documents	October 12, 2018
8. Deadline for Non-Governmental Privilege Logs	November 2, 2018
a. Deadline for any motions to compel challenging privilege entries	December 7, 2018
b. Responses to any motion to compel regarding privilege logs	14 days from date of motion
c. Replies in opposition to any motions to compel regarding privilege logs	7 days from filing of response
9. Oral Discovery to Commence <i>Custodial documents of each deponent shall be produced no later than 14 days prior to the respective deposition. All parties' counsel shall be expected to participate in all depositions.</i>	October 15, 2018
10. Deadline to Complete Fact Discovery	February 15, 2019
11. Opening Merits Expert Reports	March 15, 2019
12. Rebuttal Merits Expert Reports	April 12, 2019
13. Reply Merits Expert Reports	May 3, 2019
14. Deadline to Complete Expert and Fact Discovery	May 31, 2019
<b>B. DISPOSITIVE MOTIONS (ALL PLAINTIFFS)</b>	
15. Deadline for <i>Daubert</i> and Dispositive Motions	July 12, 2019

<u>EVENT</u>	<u>DATE</u>
16. Deadline for Responses in Opposition to any <i>Daubert</i> or Dispositive Motions	August 23, 2019
17. Deadline for Replies in Support of any <i>Daubert</i> or Dispositive Motions	September 6, 2019
<b>C. AUTHENTICOM TRIAL</b>	TBD after Court's rulings on <i>Daubert</i> and Dispositive Motions
<b>D. CLASS CERTIFICATION</b>	
18. Deadline for Motions, Plaintiffs' Designation of Experts and Accompanying Expert Reports	21 days after conclusion of <i>Authenticom</i> trial
19. Deadline for Oppositions, Defendants' Designation of Experts, and Accompanying Expert Reports	6 weeks after service of Motion for Class Certification
20. Deadline for Replies in Support of Class Certification	6 weeks after service of Oppositions
21. Deadline to Complete Class Certification Process	4 weeks after service of replies
<b>E. CLASS / NON-AUTHENTICOM PLAINTIFFS' TRIALS (IF APPLICABLE)</b>	TBD after Court's rulings on Class Certification